

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LMAR LAY, individually and for other
similarly situated,

Plaintiff,

v.

BETACOM HOLDINGS INC., Washington
for profit corporation; BETACOM
INCORPORATED, a Florida for profit
corporation,

Defendants.

Case No. 2:24-CV01195-RSM

**STIPULATION FOR EXTENSION OF
TIME TO FILE MOTIONS FOR
CONDITIONAL AND CLASS
CERTIFICATION**

NOTE ON MOTION CALENDAR:
JANUARY 30, 2025

Pursuant to Fed R. Civ. P. 6(b)(1)(A), Plaintiff LMar Lay and Defendants Betacom Holdings, Inc., and Betacom Incorporated stipulate to extend the time for Plaintiff to file his Motion for Conditional Certification and Motion for Class Certification. Under the extended schedule, Plaintiff's deadline to file his Motion for Conditional Certification will be extended to March 28, 2025. Plaintiff's deadline to file his Class Certification motion will be extended to May 16, 2025.

Counsel for Plaintiff and Defendants have conferred regarding this request. Good cause exists for this request because of the complex nature of the putative class action allegations in

1 Plaintiff's Complaint.

2 Plaintiff has not requested previous extensions from this Court. A proposed order is
3 submitted with this stipulation.

4 IT IS THEREFORE STIPULATED AND AGREED, by and between Plaintiff and
5 Defendants, by and through their counsel and subject to approval of this Court.
6

7 DATED this 30th day of January 2025.

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**Pro Hac Vice Applications Forthcoming*

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STIPULATION FOR EXTENSION OF TIME TO FILE MOTIONS FOR
CONDITIONAL AND CLASS CERTIFICATION (2:24-CV01195-RSM) - 2

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ORDER

IT IS HEREBY ORDERED that the foregoing Stipulation for Extension of Time for Plaintiff to file his Motions for Conditional and Class Certification is GRANTED.

DATED this _____ day of January, 2025.

Ricardo S. Martinez
United States District Judge